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FAA-2000-8142-3



J.R. AVIATION, INC.

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U.S. Department of Transportation
Docket Management System
400 7th Street, SW, Room PL-400
Washington, DC 20591-0001

Re: Petition for Exemption

Background

Pursuant to Section 11.25 of the Federal Aviation Regulations, J.R. Aviation, Inc., respectfully requests an exemption from Section 135.143 (C)(2) of the Federal Aviation Regulations and any other regulation necessary to allow it to operate its fleet of aircraft without TSO-C112 (Mode S) transponder installed.

J.R. Aviation, Inc. requests relief from Section 135.143 (C)(2) which states, in pertinent part:

(C) ATC transponder equipment installed within the time periods indicated must meet the performance and environmental requirements of the following TSO's.

(2) After January 1, 1992: the appropriate class of TSO-C112 (Mode S). For the purposes of paragraph (C)(2) of this section, "Installation" does not include....

(I) Temporary installation of TSO-C74b or TSO-C74c substitute equipment, as appropriate, during maintenance of the permanent equipment;

(II) Reinstallation of equipment after temporary removal for maintenance; or

(III) For fleet operations, installation of equipment in a fleet aircraft after removal of the equipment for maintenance from another aircraft in the same operator's fleet.

DEC 10 10 00 AM '02
U.S. DEPARTMENT OF TRANSPORTATION

The exemption request would apply to the attached list of J.R. Aviation, Inc. Aircraft.

Granting the Petition would not Adversely Affect Safety

Ground sensors, when combined with mode S transponders, enable air traffic control (ATC) to track aircraft more effectively, thereby reducing the likelihood of a mid air collision. However, without ground sensors, which will not be widely available for a considerable period of time, the proposed exemption will not adversely affect aviation safety.

Not Granting the Petition would Adversely affect Economics

The installation of Mode S transponders would impose a substantial financial burden. Granting the proposed exemption would generate benefits in the form of cost relief for both J.R. Aviation, Inc. and its customers.

Good Cause exists to Dispense with Publication and Comment Procedures

A delay for publication and comment procedures in the federal register would be detrimental because it would place significant economic hardship on J.R. Aviation, Inc. and its customers.

Pursuant to Section 11.25(d) of the FAR, a summary of this petition is attached.

Sincerely,



Jim Robinson,
President

Summary

J.R. Aviation, Inc. petitions for an exemption from the requirements of section 135.143 (C)(2) of the FAR, and any other regulation necessary to allow it to operate its fleet of aircraft under the provisions of part 135 without TSO-C112 (Mode S) transponders installed until FAA Mode S ground equipment to interface with TSO-C112 transponders is substantially in place nationwide and J.R. Aviation, Inc. receives reasonable notice from the FAA that the exemption is cancelled, or (B) for a 24-month (or similar) period with a feature providing for automatic extension until the FAA's Mode S ground facilities are substantially in place nationwide.

Attachment

J.R. Aviation, Inc. List of Aircraft:

N2346J	S/N 2211
N518GP	S/N 1990
N7190J	S/N 3109
N8328L	S/N 210
N218GT	S/N 218
N7184M	S/N 440
N411NC	S/N 3373
N1078T	S/N 58-1016
N45726	S/N 56-4307
N887	S/N 58-482
N99275	S/N 58-245